

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

MELISSA MARIE CALDWELL	:	
Debtor	:	CHAPTER 13
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
MELISSA MARIE CALDWELL	:	CASE NO. 5-24-bk-02336
Respondent	:	

**TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN**

AND NOW, this 10<sup>th</sup> day of February 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
  - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
  - b. The Plan fails to provide that the sale or refinance of Debtor(s) real estate will occur within six (6) months.
    - i. The Plan is ambiguous as to the Term.
2. Debtor has not demonstrated that all tax returns have been filed as required by §1325(a)(9), specifically, 2022 federal taxes have not been filed.
3. The Plan has not been served as required by LR 3015-1(b) as to the creditors listed in Paragraphs 2E and 2G of the Plan. The Plan was not served at all.

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Douglas R. Roeder  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 10<sup>th</sup> day of February 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

E. HALEY ROHRBAUGH  
CGA LAW FIRM, P.C.  
135 NORTH GEORGE ST  
YORK, PA 17401-

/s/Tammy Life  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee